
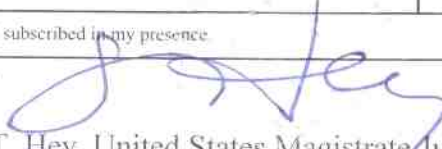


<b>United States District Court</b>		DISTRICT Eastern District of Pennsylvania	
UNITED STATES OF AMERICA v. TARIK HOOKS		DOCKET NO.	
		MAGISTRATE'S CASE NO. <b>13-252-M-1</b>	
Complaint for violation of Title 18 United States Code § 2113(a)			
NAME OF JUDGE OR MAGISTRATE  Honorable Elizabeth T. Hey		OFFICIAL TITLE  U.S. Magistrate Judge	LOCATION  Philadelphia, PA
DATE OF OFFENSE February 2, 2013 February 7, 2013 February 8, 2013 February 9, 2013 February 12, 2013 February 14, 2013 February 14, 2013 February 17, 2013 February 21, 2013	PLACE OF OFFENSE Bala Cynwyd, PA Clifton, Heights, PA Landsdowne, PA Clifton, Heights, PA Haverford, PA Bala Cynwyd, PA Philadelphia, PA Philadelphia, PA Drexel Hill, PA	ADDRESS OF ACCUSED (if known) 6112 Spruce Street Philadelphia, PA	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:  <b>SEE ATTACHMENT A</b>			
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:  <b>SEE AFFIDAVIT ATTACHED HERETO AS ATTACHMENT B.</b>			
MATERIAL WITNESSES IN RELATION AGAINST THE ACCUSED:			
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.		SIGNATURE OF COMPLAINANT (official title)  John D. Sermons 	
		OFFICIAL TITLE Special Agent Federal Bureau of Investigations	
Sworn to before me and subscribed in my presence			
SIGNATURE OF MAGISTRATE <sup>(1)</sup>   Honorable Elizabeth T. Hey, United States Magistrate Judge		DATE <b>2/27/13</b>	

(1) See Federal Rules of Criminal Procedure rules 3 and 54.

## **ATTACHMENT A**

**COUNT ONE**

On or about February 2, 2013, in the Eastern District of Pennsylvania, defendant TARIK HOOKS knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Citizen's Bank, 121 East City Avenue, Bala Cynwyd, Pennsylvania, lawful currency of the United States, that is, \$1,350, belonging to, and in the care, custody, control, management and possession of the Citizen's Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

**COUNT TWO**

On or about February 7, 2013, in the Eastern District of Pennsylvania, defendant TARIK HOOKS knowingly and unlawfully by force and violence, and by intimidation, attempted to take from employees of the Citizen's Bank, 543 North Oak Avenue, Clifton Heights, Pennsylvania, lawful currency of the United States, belonging to, and in the care, custody, control, management and possession of the Citizen's Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

**COUNT THREE**

On or about February 8, 2013, in the Eastern District of Pennsylvania, defendant TARIK HOOKS knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Wells Fargo Bank, 65 West Baltimore Avenue, Lansdowne, Pennsylvania, lawful currency of the United States, that is, \$247, belonging to, and in the care, custody, control, management and possession of the Wells Fargo Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

**COUNT FOUR**

On or about February 9, 2013, in the Eastern District of Pennsylvania, defendant TARIK HOOKS knowingly and unlawfully by force and violence, and by intimidation, attempted to take from employees of the Citizen's Bank, 543 North Oak Avenue, Clifton Heights, Pennsylvania, lawful currency of the United States, belonging to, and in the care, custody, control, management and possession of the Citizen's Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

**COUNT FIVE**

On or about February 12, 2013, in the Eastern District of Pennsylvania, defendant TARIK HOOKS knowingly and unlawfully by force and violence, and by intimidation, took from employees of the TD Bank, 401 West Lancaster Avenue, Haverford, Pennsylvania, lawful currency of the United States, that is, \$10,534, belonging to, and in the care, custody, control, management and possession of the TD Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

**COUNT SIX**

On or about February 14, 2013, in the Eastern District of Pennsylvania, defendant TARIK HOOKS knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Sovereign Bank, 1 Belmont Avenue, Bala Cynwyd, Pennsylvania, lawful currency of the United States, that is, \$8,800, belonging to, and in the care, custody, control, management and possession of the Sovereign Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

**COUNT SEVEN**

On or about February 14, 2013, in the Eastern District of Pennsylvania, defendant TARIK HOOKS knowingly and unlawfully by force and violence, and by intimidation, attempted to take from employees of the TD Bank, 5501 Ridge Avenue, Philadelphia, Pennsylvania, lawful currency of the United States, belonging to, and in the care, custody, control, management and possession of the TD Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

**COUNT EIGHT**

On or about February 17, 2013, in the Eastern District of Pennsylvania, defendant TARIK HOOKS knowingly and unlawfully by force and violence, and by intimidation, took from employees of the TD Bank, 5501 Ridge Avenue, Philadelphia, Pennsylvania, lawful currency of the United States, that is, \$1,290, belonging to, and in the care, custody, control, management and possession of the TD Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

**COUNT NINE**

On or about February 21, 2013, in the Eastern District of Pennsylvania, defendant TARIK HOOKS knowingly and unlawfully by force and violence, and by intimidation, took from employees of the TD Bank, 2200 Garrett Road, Drexel Hill, Pennsylvania, lawful currency of the United States, that is, \$1,000, belonging to, and in the care, custody, control, management and possession of the TD Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.



**AFFIDAVIT IN SUPPORT OF ARREST WARRANT**

I, JOHN DEVEN SERMONS, being duly sworn, do hereby depose and state that:

1. I am employed as a Special Agent of the Federal Bureau of Investigation ("FBI") in Philadelphia, Pennsylvania. I have been employed as a Special Agent since January 2010. I am presently assigned to the Violent Crimes Task Force, which investigates bank robberies, kidnappings, fugitives, and Hobbs Act robberies, among other violations of law.

2. I compiled the following information from a variety of sources to include my personal knowledge, information obtained during my participation in this investigation, review of documents, knowledge obtained from other individuals including law enforcement personnel, and communications with others who have personal knowledge of the events and circumstances described herein. This affidavit is being submitted in support of an arrest warrant for TARIK HOOKS for his participation in the following bank robberies and attempted bank robberies:

- a. February 2, 2013, robbery of Citizen's Bank, 121 East City Avenue, Bala Cynwyd, Pennsylvania, at which approximately \$1,350 was taken;
- b. February 7, 2013, attempted robbery of Citizen's Bank, 543 North Oak Avenue, Clifton Heights, Pennsylvania;
- c. February 8, 2013, robbery of Wells Fargo Bank, 65 West Baltimore Avenue, Lansdowne, Pennsylvania, at which approximately \$247 was taken;
- d. February 9, 2013, attempted robbery of Citizen's Bank, 543 North Oak Avenue, Clifton Heights, Pennsylvania;
- e. February 12, 2013, robbery of TD Bank, 401 West Lancaster Avenue, Haverford, Pennsylvania, at which approximately \$10,534 was taken;
- f. February 14, 2013, robbery of Sovereign Bank, 1 Belmont Avenue, Bala Cynwyd, Pennsylvania, at which approximately \$8,800 was taken;
- g. February 14, 2013, attempted robbery of TD Bank, 5501 Ridge Avenue, Philadelphia, Pennsylvania;

- h. February 17, 2013, robbery of TD Bank, 5501 Ridge Avenue, Philadelphia, Pennsylvania, at which approximately \$1,290 was taken; and
- i. February 21, 2013, robbery of TD Bank, 2200 Garrett Road, Drexel Hill, Pennsylvania, at which approximately \$1,000 was taken.

3. I have not included every fact known to me concerning this investigation, rather I have submitted only those facts and circumstances that I believe establish probable cause to support the issuance of an arrest warrant for HOOKS.

**THE FEBRUARY 14, 2013, TD BANK ATTEMPTED ROBBERY**

4. At approximately 10:25 a.m., on February 14, 2013, an unknown male (herein referred to as "UNSUB") entered the TD Bank located at 5501 Ridge Avenue, Philadelphia, Pennsylvania. UNSUB was described as being 5'10", medium to stocky build, and being in his late 20's to early 30's. Further description provided of UNSUB indicated he was wearing a dark knit cap, eyeglasses, black coat, and dark jeans. UNSUB approached the victim teller and provided a note that read "Need Cash." The teller asked UNSUB if UNSUB had an account at the bank. After hearing the teller ask if UNSUB had an account at the bank, UNSUB fled TD Bank in an unknown direction without obtaining any currency.

**THE FEBRUARY 17, 2013, TD BANK ROBBERY**

5. At approximately 12:05 p.m. on February 17, 2013, an unknown male ("UNSUB") entered TD Bank, 5501 Ridge Avenue, Philadelphia, Pennsylvania. The victim teller described UNSUB as being in his late 20's to early 30's. Further description provided of UNSUB indicated that he was wearing a black knit cap, black knit gloves, a dark hooded sweatshirt, and sneakers.

6. UNSUB approached the victim teller and provided a note that read "This is a robbery. No bait. No dye. All money." UNSUB also verbally demanded "Bottom drawer, no

dye pack, no bait.” After receiving approximately \$1,290 from the victim teller’s drawer, UNSUB exited the TD Bank and fled North on Ridge Avenue in Philadelphia, Pennsylvania. A teller present at the February 14, 2013, attempted robbery at the same location, informed members of the FBI Violent Crimes Task Force that the UNSUB responsible for the February 17 robbery of TD Bank was the same individual responsible for the February 14 attempted robbery of TD Bank.

7. Subsequent to the February 17, 2013, robbery of TD Bank, members of the FBI Violent Crimes Task Force were notified by outlying counties surrounding Philadelphia, that UNSUB was believed to be responsible for the following additional bank robberies and attempted bank robberies:

- a. February 2, 2013, robbery of Citizen’s Bank, 121 East City Avenue, Bala Cynwyd, Pennsylvania, at which approximately \$1,350 was taken;
- b. February 7, 2013, attempted robbery of Citizen’s Bank, 543 North Oak Avenue, Clifton Heights, Pennsylvania;
- c. February 8, 2013, robbery of Wells Fargo Bank, 65 West Baltimore Avenue, Lansdowne, Pennsylvania, at which approximately \$247 was taken;
- d. February 9, 2013, attempted robbery of Citizen’s Bank, 543 North Oak Avenue, Clifton Heights, Pennsylvania;
- e. February 12, 2013, robbery of TD Bank, 401 West Lancaster Avenue, Haverford, Pennsylvania, at which approximately \$10,534 was taken;
- f. February 14, 2013, robbery of Sovereign Bank, 1 Belmont Avenue, Bala Cynwyd, Pennsylvania, at which approximately \$8,800 was taken;

8. Investigators viewed surveillance photographs taken during the above stated robberies and attempted robberies, and compared those photographs with surveillance photographs taken from the February 14, 2013, attempted robbery and the February 17, 2013, robbery of TD Bank, 5501 Ridge Avenue, Philadelphia, Pennsylvania. Investigators concluded



that the surveillance photographs appeared to depict the same subject responsible for robbing all above stated banks.

9. Detective James Colligan of the Aldan Police Department advised me that shortly after the February 7, 2013, attempted bank robbery at 543 North Oak Avenue, Clifton Heights, Pennsylvania, surveillance video shows the suspect bank robber flee the area in a white SUV.

10. Lansdowne Police Department Sergeant Daniel Donegan advised me that he had received a tip from Wells Fargo Security Director James Keenan. Keenan informed Donegan that Keenan received an anonymous call identifying TARIK HOOKS as the individual responsible for the February 8, 2013, robbery of Wells Fargo Bank, 65 West Baltimore Avenue, Lansdowne, Pennsylvania. After receiving this information from Keenan, Donegan conducted surveillance at HOOKS' residence and observed a male matching HOOKS' description exit 6112 Spruce Street, Philadelphia, Pennsylvania. The male matching HOOKS' description, entered a white Lexus SUV, Pennsylvania license plate JFM4354, and departed the area.

11. The Philadelphia FBI Violent Crimes Task Force determined that Pennsylvania license plate JFM4354 was registered to Pacifico Ford, Inc., located at the cross streets of 67<sup>th</sup> Street and Essington Avenue in Philadelphia, Pennsylvania. Pacifico Ford was contacted and advised members of the Philadelphia FBI Violent Crimes Task Force that the white Lexus SUV in question was purchased by TARIK HOOKS, 1638 North Allison Street, Philadelphia, Pennsylvania on February 1, 2013.

12. On February 21, 2013, I was notified of a bank robbery that occurred at TD Bank, 2200 Garrett Road, Drexel Hill, Pennsylvania. The robbery was committed by an unknown black male ("UNSUB"). According to witnesses at the scene, UNSUB was described as being a black male wearing a dark colored hat and wig. Witnesses stated that after committing the above stated



robbery, UNSUB pushed a small child to the floor and fled the scene in a dark colored sedan bearing a Pennsylvania license plate that began with the letter H and ended with the number 3.

13. Moments after the robbery of TD Bank, 2200 Garrett Road, Drexel Hill, Pennsylvania, on February 21, 2013, a dark colored sedan believed to be used in the robbery was found approximately three blocks from the bank. The abandoned dark sedan had a Pennsylvania license plate HNL8943.

14. Subsequent to being notified of the February 21, 2013, robbery of TD Bank, 2200 Garrett Road, Drexel Hill, Pennsylvania, I was requested by the Philadelphia Police Department (PPD) to retrieve surveillance video from the M&M Grocery, 5900 Chestnut Street, Philadelphia, Pennsylvania. According to the PPD, shortly before the February 21, 2013, robbery of TD Bank occurred, a dark colored sedan was stolen outside M&M Grocery, and the incident was believed to have been captured on M&M Grocery surveillance cameras. The stolen dark colored sedan was described as being a black Lexus with Pennsylvania license plate number HNL8943.

15. I went to M&M Grocery and reviewed the surveillance video. Observed in the video was the following: A black male was seen exiting a white Lexus SUV, approach a dark colored sedan sitting outside M&M Grocery, enter the dark colored sedan and drive the vehicle away in an unknown direction. The white Lexus SUV remained at the scene.

16. On the evening of February 21, 2013, I recovered the stated surveillance video footage and later stored the footage on a compact disc.

17. The white Lexus RX330, Pennsylvania license plate JFM4354, and the black Lexus SC300, license plate HNL8943, were impounded at the Philadelphia Police Department Auto Squad, 4298 Whitaker Street, Philadelphia, Pennsylvania.

18. On the night of February 21, 2013, a search warrant was issued to the Philadelphia

Police Department authorizing the search of the white Lexus RX330, license plate JFM4354, and the black Lexus SC300, license plate HNL8943.

19. Pursuant to the search warrant, on the morning of February 22, 2013, the Philadelphia FBI Evidence Response Team searched the white Lexus RX330, Pennsylvania license plate JFM4354, and the black Lexus SC300, Pennsylvania license plate HNL8943. Found during the search of the black Lexus was a black hat and wig, similar to the hat and wig worn by UNSUB during the February 21, 2013, robbery of TD Bank, 2200 Garrett Road, Drexel Hill, Pennsylvania. Found during the search of the white Lexus SUV was one Motorola cellular telephone, one envelope addressed to TARIK HOOKS, 3416 Fairmount Avenue, Philadelphia, Pennsylvania, with forwarding address 6112 Spruce Street, Philadelphia, Pennsylvania, and one wallet with a Pennsylvania drivers license issued to TARIK HOOKS.

20. On the evening of February 22, 2013, a Philadelphia arraignment court magistrate judge issued an arrest warrant for TARIK HOOKS for the February 21, 2013, theft of a black Lexus SC300, license plate HNL8943.

21. On the night of February 22, 2013, members of the Philadelphia FBI and the Philadelphia Police Department executed the arrest warrant for HOOKS at 6112 Spruce Street, Philadelphia, Pennsylvania. HOOKS was found inside 6112 Spruce Street and taken to Philadelphia FBI headquarters, 600 Arch Street, Philadelphia, Pennsylvania. While at Philadelphia FBI headquarters, HOOKS was advised of his constitutional rights and thereafter signed an Advice of Rights form waiving his rights. HOOKS then provided a statement confessing to the bank robberies and attempted bank robberies listed in paragraph 2 above and to February 10, 2013, robbery of Citizen's Bank, 2084 Naamans Road, Wilmington Delaware, at which approximately \$1,075 was taken.

22. Citizens Bank, Wells Fargo Bank, Sovereign Bank, and TD Bank, are federally insured by the Federal Deposit Insurance Corporation (FDIC).

23. Based on all of the facts set forth in this affidavit and based on my training and experience, I have probable cause to believe that TARIK HOOKS conspired to rob, attempt to rob and/or robbed the following FDIC insured banking institutions:

- a. February 2, 2013, robbery of Citizen's Bank, 121 East City Avenue, Bala Cynwyd, Pennsylvania, at which approximately \$1,350 was taken;
- b. February 7, 2013, attempted robbery of Citizen's Bank, 543 North Oak Avenue, Clifton Heights, Pennsylvania;
- c. February 8, 2013, robbery of Wells Fargo Bank, 65 West Baltimore Avenue, Lansdowne, Pennsylvania, at which approximately \$247 was taken;
- d. February 9, 2013, attempted robbery of Citizen's Bank, 543 North Oak Avenue, Clifton Heights, Pennsylvania;
- e. February 12, 2013, robbery of TD Bank, 401 West Lancaster Avenue, Haverford, Pennsylvania, at which approximately \$10,534 was taken;
- f. February 14, 2013, robbery of Sovereign Bank, 1 Belmont Avenue, Bala Cynwyd, Pennsylvania, at which approximately \$8,800 was taken;
- g. February 14, 2013, attempted robbery of TD Bank, 5501 Ridge Avenue, Philadelphia, Pennsylvania;
- h. February 17, 2013, robbery of TD Bank, 5501 Ridge Avenue, Philadelphia, Pennsylvania, at which approximately \$1,290 was taken; and
- i. February 21, 2013, robbery of TD Bank, 2200 Garrett Road, Drexel Hill, Pennsylvania, at which approximately \$1,000 was taken,



all in violation of Title 18, United States Code, Section 2113(a).



JOHN DEVEN SERMONS  
Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed  
before me this 27<sup>th</sup> day of February 2013.



HONORABLE ELIZABETH T. HEY  
United States Magistrate Judge